

MOD 055872204

MAR 05 1984

MEMORANDUM

DATE: March 1, 1984

TO: Waste Management Program, Enforcement Staff

FROM: *BM* Bruce Martin thru Rick Roberts thru James Burris, PBRO

SUBJECT: 1.300 WEST PLAINS - Eaton Control Plant

Please find attached an "Uncontrolled Hazardous Waste Site Inspection" for the Eaton Controls Plant, West Plains, Missouri. As you will note, this facility is not an uncontrolled site and the recommendation is for no further action.

Should you have questions or comments, you are encouraged to contact Poplar Bluff Regional Office.

BM/rc

Attachments

SUPERFUND  
MAY 31 1984  
SITE LOG

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
948 Lester Street  
Poplar Bluff, Missouri 63901  
(314) 785-0832

Christopher S. Bond Governor  
Fred A. Lafser Director  
Poplar Bluff Regional Office

## UNCONTROLLED HAZARDOUS WASTE SITE INVESTIGATION

Eaton Controls Plant  
210 Allen Street  
West Plains, MO  
Howell County

### I. Investigator:

R. Bruce Martin, an Environmental Specialist with the Waste Management Unit of the Poplar Bluff Regional Office, Missouri Department of Natural Resources, has conducted this preliminary assessment.

### II. Date Investigation Initiated: December 28, 1983

Date Investigation Completed: February 14, 1984

### III. Background of the Investigation:

This facility notified the United States Environmental Protection Agency on August 18, 1980 of its hazardous waste activities. At that time, Mr. David Hughes of the Eaton Corporation, requested Interim Status for the West Plains Plant, as a generator, and as a treatment/storage/disposal site. Although he stressed that he believed that the plant did not meet the definition of a generator or TSD Facility at the time, it was the company's belief that in a "healthier business cycle" they might so qualify. On October 31, 1980, U. S. Environmental Protection Agency sent an "Acknowledgement of Notification of Hazardous Waste Activity" Notice concerning the West Plains Plant to Eaton Corporation Divisional Headquarters in Carol Stream, Illinois. On August 4, 1982, as a result of file review, U. S. Environmental Protection Agency notified Eaton Corporation, West Plains Plant, that a "Part A" Application for hazardous waste storage had not been submitted, as required. On August 20, 1982, Joline Jacobs of Eaton Corporation, Carol Stream, Illinois, replied to the U. S. Environmental Protection Agency. Ms. Jacobs made reference to a May 5, 1981 letter of correspondence addressed to "RCRA Activities", Chicago, in which the company requested a review of their status and a deletion for TSD designation in West Plains. On August 27, 1982, per U. S. Environmental Protection Agency internal memo, the TSD designation for West Plains was amended to classify the West Plains facility, as a generator only.

IV. Identity of Persons Interviewed for this Report:

- Clark A. Webster, Plant Manager, Eaton Corporation of West Plains, 210 Allen Street, West Plains, Missouri (417)256-7171.
- Alvin Moss, Acting Materials Supervisor, Eaton Corporation, 210 Allen Street, West Plains, Missouri (417)256-7171

V. Brief Summary of Information Obtained:

This site is a RCRA regulated facility and appears to have no past history of the improper handling of hazardous wastes.

VI. Detailed Account of the Investigation:

A file search was conducted at the Poplar Bluff Regional Office concerning the activities of this facility. The company's RCRA inspection file, relevant air pollution control files, West Plains wastewater file, and West Plains Sanitary Landfill file were reviewed.

In a telephone conversation on February 14, 1984 with Mr. Alvin Moss, Acting Materials Supervisor, Eaton Plant, West Plains, it was learned that this facility has operated since 1970. The only waste stream currently generated by the company is spent trichlorethylene, purchased under the trade name Perm-A-Chlor NA, which is used as a degreasing solvent for metal parts, prior to zinc plating. It is currently reclaimed by resource recovery. Previous one time only disposal of a cyanide sludge from the zinc plating operation was disposed of at the Kansas Industrial Environmental Service Facility in August 1981. According to Alvin Moss, this sludge represented the accumulation of years of operation of 1970 to August 1981. Since then, a plating solution has been used containing non-hazardous bearing waste compounds.

Mr. Moss indicated that to the best of his knowledge, all wastes generated by Eaton Corporation, West Plains, have received proper disposal. He is not aware of any hazardous type wastes receiving disposal on company property.

VII. Conclusion and Recommendations:

Since this site is currently regulated by RCRA, and indications are that hazardous wastes generated by this facility have been properly handled, now and in the past, it is recommended that this facility be removed from any further investigations, as an uncontrolled hazardous waste site.

VIII. List of Appendices to this Report:


Attachment #1 - City Map locating site.

Attachment #2 - References

Attachment #3 - EPA Forms :

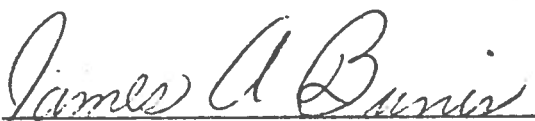
IX. Signatures:

SUBMITTED BY:

  
\_\_\_\_\_  
Bruce Martin  
Environmental Specialist  
Waste Management Unit  
Poplar Bluff Regional Office  
Missouri Dept. of Natural Resources

March 1, 1984  
Date

APPROVED BY:

  
\_\_\_\_\_  
James A. Burris  
Regional Administrator  
Poplar Bluff Regional Office  
Missouri Dept. of Natural Resources

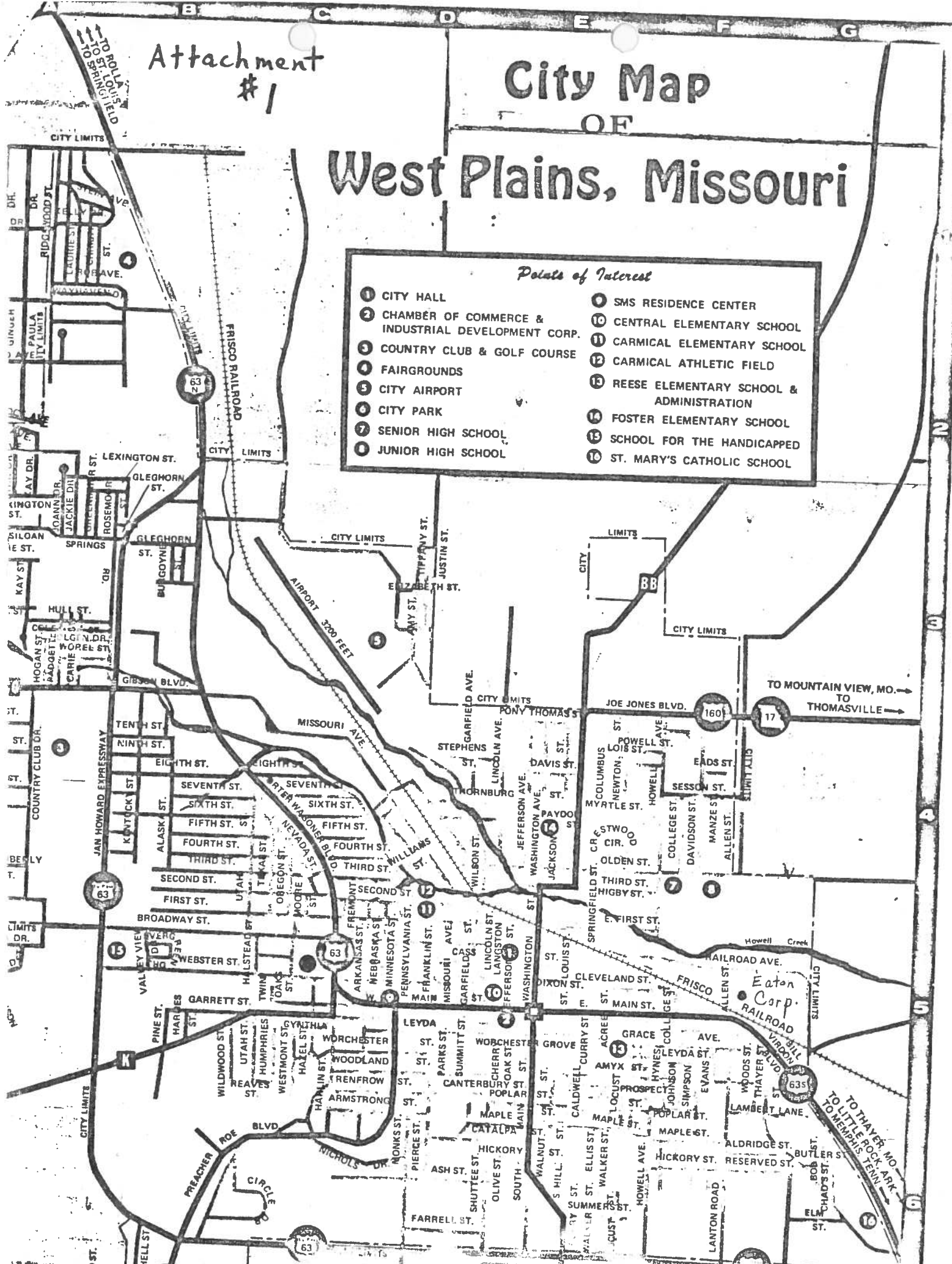
March 1, 1984  
Date

Attachment  
#1

# City Map OF West Plains, Missouri

## Points of Interest

- |  |   |
|--|---|
| 1 CITY HALL  | 10 SMS RESIDENCE CENTER                     |
| 2 CHAMBER OF COMMERCE & INDUSTRIAL DEVELOPMENT CORP. | 11 CENTRAL ELEMENTARY SCHOOL                |
| 3 COUNTRY CLUB & GOLF COURSE                         | 12 CARMICAL ELEMENTARY SCHOOL               |
| 4 FAIRGROUNDS  | 13 CARMICAL ATHLETIC FIELD                  |
| 5 CITY AIRPORT                                       | 14 REESE ELEMENTARY SCHOOL & ADMINISTRATION |
| 6 CITY PARK  | 15 FOSTER ELEMENTARY SCHOOL                 |
| 7 SENIOR HIGH SCHOOL                                 | 16 SCHOOL FOR THE HANDICAPPED               |
| 8 JUNIOR HIGH SCHOOL                                 | 17 ST. MARY'S CATHOLIC SCHOOL               |



ATTACHMENT #2

REFERENCES

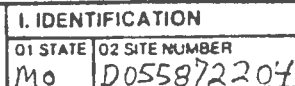
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RCRA Inspection File - 3.500 HOWELL COUNTY, Eaton Controls Plant

Attachment  
#3

"No Action Needed"

<b>POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT</b>		<b>I. IDENTIFICATION</b> 01 STATE <b>MO</b> 02 SITE NUMBER <b>D055872204</b>	
<b>II. SITE NAME AND LOCATION</b>			
01 SITE NAME (Legal, common, or descriptive name of site) <b>EATON CONTROLS PLANT</b>		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER <b>210 Allen Street</b>	
03 CITY <b>West Plains</b>	04 STATE <b>MO</b>	05 ZIP CODE <b>65775</b>	06 COUNTY <b>Howell</b>
07 COUNTY CODE <b>091</b>	08 CONG DIST <b>8</b>	09 COORDINATES LATITUDE <b>36° 43' 45" N</b>	
LONGITUDE <b>91° 50' 30" W</b>		Phone <b>(417) 256-7171</b>	
10 DIRECTIONS TO SITE (Starting from nearest public road) <b>Located on 210 Allen Street as per attached portion of city of West Plains Map.</b>			
<b>III. RESPONSIBLE PARTIES</b>			
01 OWNER (If known) <b>EATON CORPORATION</b>		02 STREET (Business, mailing, residential) <b>100 ERIE VIEW PLAZA</b>	
03 CITY <b>CLEVELAND</b>	04 STATE <b>OH</b>	05 ZIP CODE <b>44114</b>	06 TELEPHONE NUMBER <b>(216) 523-5000</b>
07 OPERATOR (If known and different from owner) <b>Same</b>		08 STREET (Business, mailing, residential)	
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN			
14 OWNER/OPERATOR NOTIFICATION ON FILE (check all that apply) <input checked="" type="checkbox"/> A. RCRA 3001 DATE RECEIVED: <b>8/12/80</b> MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED _____ MONTH DAY YEAR <input checked="" type="checkbox"/> C. NONE			
<b>IV. CHARACTERIZATION OF POTENTIAL HAZARD</b>			
01 ON SITE INSPECTION <input type="checkbox"/> YES    DATE _____ MONTH DAY YEAR <input checked="" type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____	
02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION BEGINNING YEAR <b>1970</b> ENDING YEAR _____ <input type="checkbox"/> UNKNOWN	
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED  <b>D/N/A</b>			
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION  <b>D/N/A</b>			
<b>SUPERFUND</b>			
<b>MAY 31 1984</b>			
<b>SITE LOG</b>			
<b>V. PRIORITY ASSESSMENT</b>			
01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time available basis) <input checked="" type="checkbox"/> D. NONE (No further action needed, complete current disposition form)			
<b>VI. INFORMATION AVAILABLE FROM</b>			
01 CONTACT <b>Alvin Moss</b>		02 OF (Agency Organization) <b>EATON CONTROLS PLANT</b>	
03 TELEPHONE NUMBER <b>(417) 256-7171</b>		04 PERSON RESPONSIBLE FOR ASSESSMENT <b>R. Bruce Martin</b>	
05 AGENCY <b>MO DNR</b>	06 ORGANIZATION <b>DEQ</b>	07 TELEPHONE NUMBER <b>(314) 785-0832</b>	08 DATE <b>2/14/84</b> MONTH DAY YEAR



. I HIGHLY VOLATILE  
 . J EXPLOSIVE  
 . K REACTIVE  
 . L INCOMPATIBLE  
 . M NOT APPLICABLE

## EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
MO D055872204

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

D/N/A

01 ☐ B. SURFACE WATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

D/N/A

01 ☐ C. CONTAMINATION OF AIR  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

D/N/A

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

D/N/A

01 ☐ E. DIRECT CONTACT  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

D/N/A

01 ☐ F. CONTAMINATION OF SOIL  
03 AREA POTENTIALLY AFFECTED: \_\_\_\_\_ (Acres)

02 ☐ OBSERVED (DATE \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

D/N/A

01 ☐ G. DRINKING WATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

D/N/A

01 ☐ H. WORKER EXPOSURE/INJURY  
03 WORKERS POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

D/N/A

01 ☐ I. POPULATION EXPOSURE/INJURY  
03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_)  
04 NARRATIVE DESCRIPTION

☐ POTENTIAL ☐ ALLEGED

D/N/A



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
MO 0055872204

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

D/N/A

01 ☐ K. DAMAGE TO FAUNA  
04 NARRATIVE DESCRIPTION (include name(s) of species)

02 ☐ OBSERVED (DATE: \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

D/N/A

01 ☐ L. CONTAMINATION OF FOOD CHAIN  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

D/N/A

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES  
(Spills, runoff, standing liquids, leaking drums)

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

04 NARRATIVE DESCRIPTION

D/N/A

01 ☐ N. DAMAGE TO OFFSITE PROPERTY  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

D/N/A

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

D/N/A

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL

☐ ALLEGED

D/N/A

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

NONE

III. TOTAL POPULATION POTENTIALLY AFFECTED: \_\_\_\_\_

IV. COMMENTS

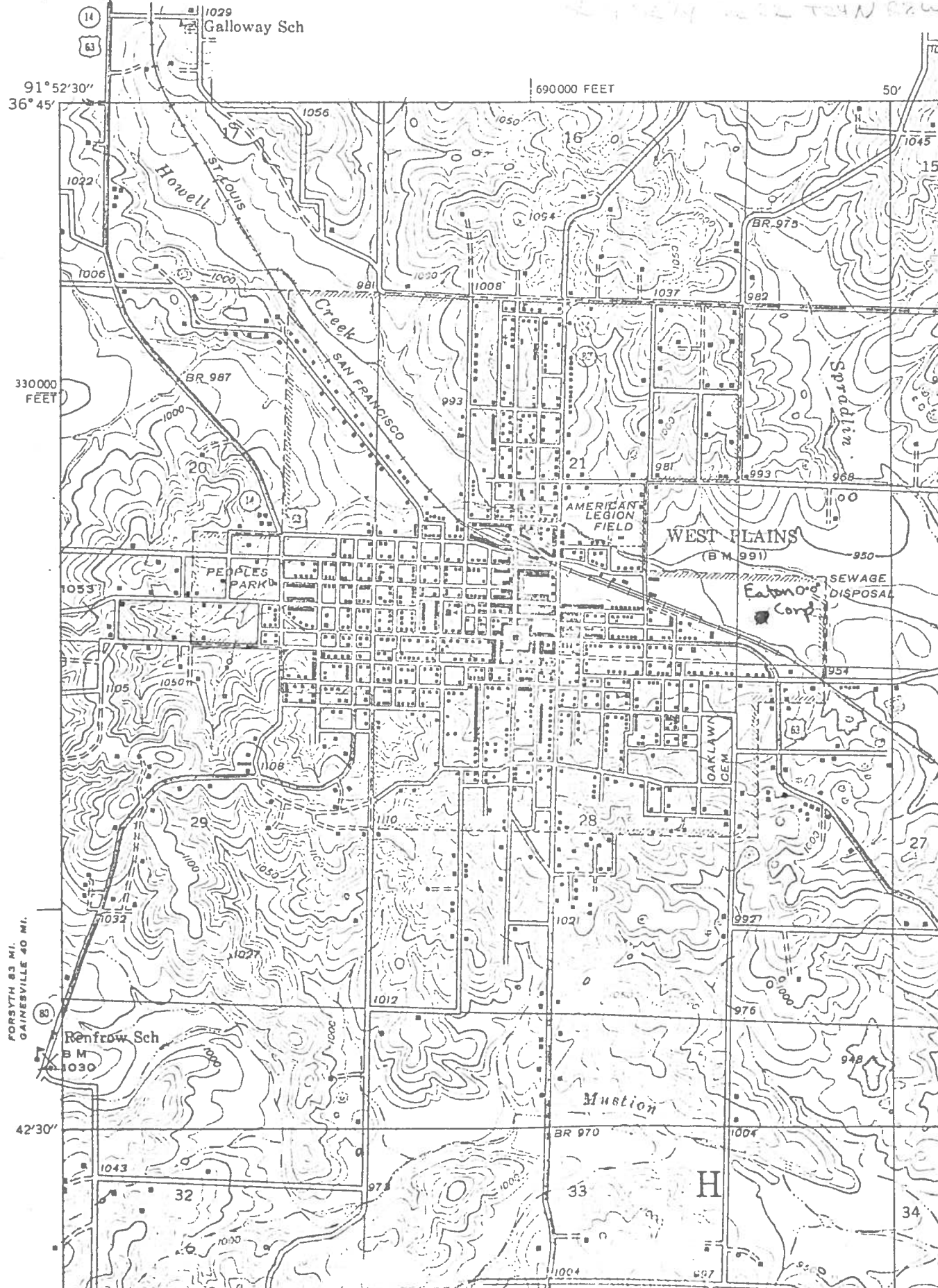
This facility has been determined to be a RCRA regulated facility and is not an uncontrolled site.

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis results)

RCRA file for Enviro Co. and information obtained from Alvin Mess, Acting Materials Manager.

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
GEOLOGICAL SURVEY

CABOOL 34 MI.  
POMONA 10 MI.



# CONVERSATION RECORD

TIME

DATE

11/25/83

TYPE

☐ VISIT

☒ CONFERENCE

☐ TELEPHONE

ROUTING

NAME/SYMBOL

INT

Location of Visit/Conference:

☐ INCOMING

☐ OUTGOING

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

ORGANIZATION (Office, dept., bureau, etc.)

TELEPHONE NO.

Jane Sullens

MDNR

SUBJECT

Transfer of ERRIS files for 3012 Grant

SUMMARY

Attached is the file for the above facility which appears on ERRIS:

Facility Name: Eaton Corp

ID Number: MOD055872204

ACTION REQUIRED

Transferred to MDNR 3012 Program

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

Shamir

11/25/83

ACTION TAKEN

SIGNATURE

TITLE

DATE

# ROUTING AND TRANSMITTAL SLIP

Date

11/18

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1. *Alfetta*

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

On 8/27 we processed a "delete TSD" charge on Eaton - MOD 0558 72204. It didn't take - still shows in 10/27 GPO.

Pls. try again. 11-22-82 ag

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

*hh*

Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206

☆ GPO : 1981 O - 361-529 (145)

## ROUTING AND TRANSMITTAL SLIP

Date

8/27

To: (Name, office symbol, room number,  
building, Agency/Post)

Initials

Date

1.

*Alquetta*

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

*Eaton Controls*  
*MOD055872204*

*Gen. Only*  
*Delete TSD ✓*

DO NOT use this form as a RECORD of approvals, concurrences, disposals,  
clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Phone No.

5041-102

★ U.S. G.P.O. 1980-311-156/27

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Ms. Jodine Jacobs  
Eaton Corporation  
Controls Division  
191 E. North Avenue  
Carol Stream, Illinois 60187

RE: MOD055872204 - West Plains, Missouri

Dear Ms. Jacobs:

Thank you for your prompt response to our request for clarification of the above facility's status in the Federal Resource Conservation and Recovery Act (RCRA) program.

Based on your response and our telephone conversation, we are changing its status to generator.

If the process should change, or if you do not understand the requirements placed on a generator, please feel free to contact Mrs. Betti Harris of my staff at 816-374-6534.

The action described in this letter pertains only to the Federal RCRA system and does not dismiss you from the necessity to comply with the Missouri Solid and Hazardous Waste Laws and Regulations, 260.200 - 260.240 RSMo and 260.350 - 260.430 RSMo respectively. If you have any questions concerning this, please contact the Waste Management Program of the Missouri Department of Natural Resources at 314-751-3241.

Sincerely yours,

Robert L. Morby  
Chief, Waste Management Branch  
Air and Waste Management Division

cc: David Bedan, Director  
Waste Management Program, MDNR

bcc: Mike Sanderson, AWCN

ARWM:WMBR:SPRS-B-HARRIS-Jp-x6534-8/25/82-Disk #9 #49  
CONCURRENCES

SYMBOL	SPRS	SPRS	WMBR					
SURNAME	HARRIS	MCLAUGHLIN	MORBY					
DATE			8-25-82					

**EAT•N****Speed Letter**Date 8/20/82To Ms. Betti HarrisFrom Jodine Jacobs

**Subject** Per our telephone conversation today, attached is the letter I sent to RCRA-Chicago requesting that the Treat/Store/Dispose status be removed for my seven plant locations. I was unaware at the time that correspondence regarding the West Plains, Mo plant should be sent to your attention.

As indicated in the letter, I have taken over responsibility for the chemical management program at Eaton Corp., Controls Div. All correspondence should be sent

to my attention at: Eaton Corporation

Please Reply To → Signed: *Jodine Jacobs***Reply**

Controls Division

191 E. North Ave.

Carol Stream, IL 60187

Attn: Jodine Jacobs

**EPA-ARHM/HWMS**

AUG 25 1982

cc: Jim Counts

Eaton West Plains

Region VII, Kansas City, Missouri 64101

~~dispose activity status for the following Eaton Corporation,~~  
Controls Division locations.

EATON CORP., Controls Division, Batavia Plant  
204 South Water Street  
Batavia, IL 60510  
EPA I.D. Number - ILD005217104

EATON CORP., Controls Div., Carol Stream  
191 East North Avenue  
Carol Stream, IL 60187  
EPA I.D. Number - ILD005094412

May 5, 1981

RCRA ACTIVITIES  
P.O. Box 7861  
Chicago, IL 60680

In August, 1980, Eaton Corporation, Controls Division filed Notifications of Hazardous Waste Activity for the seven locations listed below. Each application indicated that the type of Hazardous Waste Activity (Item VI) would be both A. Generation and C. Treat/Store/Dispose.

The gentleman responsible for our Chemical Management Program at the time, David Hughes, did this as a precautionary measure. As noted in one of his letters to the USEPA (attached), he did not believe Eaton met the requirements of a treater/storer/disposer, but could possibly in a healthier business cycle.

As the new manager of Eaton's Chemical Management Program, I have reviewed the chemical waste generated at each of our plants. Based on my observations, I do not believe that this status is necessary.

Please make the appropriate changes to delete the Treat/Store/Dispose activity status for the following Eaton Corporation, Controls Division locations.

EATON CORP., Controls Division, Batavia Plant  
204 South Water Street  
Batavia, IL 60510  
EPA I.D. Number - ILD005217104

EATON CORP., Controls Div., Carol Stream  
191 East North Avenue  
Carol Stream, IL 60187  
EPA I.D. Number - ILD005094412

EATON CORP., Controls Div., Hanover Plant  
107 Washington Street  
Hanover, IL 61041  
EPA I.D. Number - 1LD054235833

EATON CORP., Controls Div., Rochelle Plant  
200 East Ave. G  
Rochelle, IL 61068  
EPA I.D. Number - 1LD058587387

EATON CORP., Controls Div., Savanna Plant  
199 Viaduct Road  
Savanna, IL 61074  
EPA I.D. Number - 1LD049394406

EATON CORP., Controls Div., Warren Plant  
604 S. Railroad Street  
Warren, IL 61087  
EPA I.D. Number - 1LD069944007

EATON CORP., Controls Div., West Plains Plant  
210 Allen Street  
West Plains, MO 65775  
EPA I.D. Number - MOD055872204

All communication should be sent to my attention at our division headquarters at:

EATON CORP.  
Controls Division  
191 East North Avenue  
Carol Stream, IL 60187  
Attn: Jodine Jacobs  
(312) 260-3005

Jodine Jacobs  
Buyer

JJ/es

Enclosure

AUG 04 1982

Mr. David Hughes  
Eaton Corporation  
Controls Division  
191 East North Avenue  
West Plains, Missouri 65775

RE: MOD055872204, West Plains

Dear Mr. Hughes:

Our records show that in 1980, you submitted a Resource Conservation and Recovery Act (RCRA) notification for the above listed facility, and indicated that it was involved in the "treatment, storage and disposal" (TSD) of a hazardous waste as defined in 40 CFR Parts 260-265. However, you did not elect to complete your request for Interim Status under the Act by following that notification with the submittal of a Part A Permit Application. It is no longer possible to receive Interim Status except under selected conditions, according to the RCRA regulations, but as a "TSD" facility, you may be subject to the full RCRA permitting regulations unless you advise us to the contrary.

Many persons completed this notification form incorrectly, so for purposes of clarification, you should consider the following in determining your correct status under the regulations:

1. If you treat on site, store on site longer than 90 days, or dispose on site any of the hazardous wastes listed in 40 CFR Part 261, your facility is probably correctly identified as a TSD.
2. If you generate, as a result of your operating processes, one or more of these listed wastes in excess of 1000 kg per month (2200 lbs) or 1 kg per month (2.2 lbs) of an acute hazardous waste as listed, and if you do not store these wastes for longer than 90 days, then your facility is probably correctly identified as a generator.
3. If your facility is engaged in the transportation of any of these hazardous wastes in the course of your operating processes, then it is probably correctly identified as a transporter. If the material is transported from your facility by another firm, then your facility is not a transporter.

4. If you generate, as a result of your operating processes, one or more of these listed wastes in excess of 100 kg per month but less than 1000 kg/month your facility is a generator by definition under the Missouri State Hazardous Waste Law and Regulations, but is defined as a "small quantity generator" under the Federal RCRA regulations.
5. If you notified us under RCRA because your hazardous waste was identified as "PCB's," you are regulated under the Toxic Substances Control Act (TSCA) and may be exempt from regulation under RCRA.
6. You should have checked block "D", Underground Injection, if an injection well is located at your facility. An injection well is defined as any man-made hole in the ground that is deeper than it is wide and that is used for the subsurface placement of fluid, including septic tanks that have the capacity to serve 20 or more people.

In order to correctly identify your facility's status within the program, it is very important that you consider the above points and respond to us in writing within 15 days of the date of receipt of this letter, providing us with the correct information. The letter should be signed by the person who signed the initial notification, or if that person is no longer employed by the facility, it should be signed by his or her successor and your letter should so state. If we do not hear from you within 15 days, it will be necessary to refer your file to our Compliance staff for additional follow-up.

If you have any questions about this process please contact Ms. Betti Harris, Missouri Coordinator, who can be reached at 816-374-6534.

Thank you for your cooperation.

Sincerely yours,

Robert L. Morby  
Chief, Waste Management Branch  
Air and Waste Management Division

cc: David Bedan, Director  
Waste Management Program, MDNR

Enclosure

# RECORD COMMUNICATION

☐ PHONE CALL ☐ DISCUSSION ☐ FIELD TRIP ☐ CONFERENCE  
☐ OTHER (SPECIFY) REVIEW OF FILES & HWDMS ANALYSIS

(Record of item checked above)

TO:

PERMANENT FILE FOR: *Eaton Corp.*  
FACILITY NAME: *Eaton Corp.*  
FACILITY NUMBER: *MO10055872204*

FROM:

Name of Reviewer

DATE

TIME

*6/30/82*

SUBJECT

"INTERIM STATUS PRESUMPTION" - STATUS AND FOLLOW UP ACTION REPORT

## SUMMARY OF COMMUNICATION

The above facility's standing in the RCRA PERMIT PROGRAM as of this date is as follows:

- (1) An acknowledgement of receipt of Part A was granted on \_\_\_\_\_
- (2) A Round Two Review was completed and conditional interim status was granted on \_\_\_\_\_
- (3) Because of filing date problems, interim status has not been resolved. Current action being taken to remedy the situation is:
- (4) Because of some other problem, interim status is in doubt. Current action:
- (5) This facility was granted an ISCL on:
- (6) This facility was placed on a compliance schedule on:
- (7) This facility marked TSD but did not submit a Part A. Current action is:  
*Interim 8/4/82*
- (8) HWDMS entry ~~as~~ as of this date appears to be correct
- (9) HWDMS entry needs to be changed as follows:
- (10) Comments:

## CONCLUSIONS, ACTION TAKEN OR REQUIRED

Original copy to WMBR permanent file. Copies to HWDMS, PERM, COMPL, SPRS, STATE

NOTES:

## INFORMATION COPIES

TO: